

Caltrans Comments
on
Metals TMDLs
for
the Los Angeles River & Ballona
Creek

- Implementation of multiple TMDLs individually are not cost effective. Suggest holistic approach
- Designated uses are not supported by the existing conditions of the waterbodies (access restrictions, aquatic ecosystems, etc)
- Cost analyses do not include life cycle cost and others, (r.o.w., traffic control, permits, mitigations, etc)

- Caltrans rights of way represent 1.3% of the land area in both watersheds
 - Los Angeles River
 - Watershed total: 533,760 acres
 - Caltrans: 6,865 acres, 1.29%
 - Ballona Creek
 - Watershed Total: 81,920 acres
 - Caltrans 1,078 acres, 1.32%

- Economic Impacts

- Los Angeles River

- Implement sand filters for 40% of Caltrans land area
 - \$300 millions (min, based on life cycle costs)

- Ballona Creek

- Implement infiltration trenches for 40% of Caltrans land area
 - \$45 millions (min, based on life cycle costs)

- Costs do not include R.O.W. and additional costs (design, permits, mitigations, maintenance access, traffic control, etc.)

Other Comments

- Not enough sample for low flow model. More data is needed
- POTW discharges routinely exceed standards. MS4 permittees would be unfairly penalized
- Transportation use is not included in the hydrodynamic WQ model to support WLAs.
- Need to provide site specific evaluation for WER. Current assumption of 1.0 might not be realistic (assumes all metals are bio-available)

Other Comments

- Load duration curves are confusing, need further explanation.
- Economic analysis assumes 60% of watershed could achieve compliance without structural BMPs. This requires justification

Other Comments

- Economic analysis assumes 20% of the watershed could be treated with infiltration facilities
 - Infiltration process is subject to constraints such as soils characteristics, groundwater level, gw and soils contamination, maintenance access, traffic safety, etc.
 - Assumption of 20% may be optimistic

- Caltrans continues evaluating impacts
- Look forward to cooperating with agencies.
- Questions/Answers